EPA-4758

Susan Stahle/DC/USEPA/US To Wendy Blake

03/05/2012 01:05 PM cc

bcc

Subject Re: Revisions to Subpart W Preamble and Rule - PRA/ICR

and cost impacts discussion issues

Ok thanks, I'll make sure they pursue it. (b)(5) - Deliberative Process Privilege

Susan Stahle Air and Radiation Law Office (Rm 7502B) Office of General Counsel U.S. Environmental Protection Agency

1200 Pennsylvania Avenue, NW (ARN: MC 2344A)

Washington, D.C. 20460 ph: (202) 564-1272 fax: (202) 564-5603 stahle.susan@epa.gov

Wendy Blake Sue - I think this is correct. I think they can simpl... 03/05/2012 01:02:12 PM

From: Wendy Blake/DC/USEPA/US
To: Susan Stahle/DC/USEPA/US@EPA

Date: 03/05/2012 01:02 PM

Subject: Re: Revisions to Subpart W Preamble and Rule - PRA/ICR and cost impacts discussion issues

Sue - I think this is correct. I think they can simply update the ICR renewal to add the new requirement. Sheila may have encountered a similar situation with her 112(j) reg. revisions a few years ago. W

Wendy L. Blake U.S. Environmental Protection Agency Office of General Counsel

phone: (202) 564-1821 fax: (202) 564-5603

Susan Stahle The ICR renewal would apply for the existing rep... 03/05/2012 12:59:15 PM

From: Susan Stahle/DC/USEPA/US
To: Tom Peake/DC/USEPA/US@EPA

Cc: Reid Rosnick/DC/USEPA/US@EPA, Alan Perrin/DC/USEPA/US@EPA, Daniel

Schultheisz/DC/USEPA/US@EPA, Wendy Blake/DC/USEPA/US@EPA, Philip

Egidi/DC/USEPA/US@EPA

Date: 03/05/2012 12:59 PM

Subject: Re: Revisions to Subpart W Preamble and Rule - PRA/ICR and cost impacts discussion issues

The ICR renewal would apply for the existing reporting requirements in the rule. Subpart W does not currently contain recordkeeping requirements, so the ICR renewal would not address them.

I don't know whether the ICR renewal could be amended to include the recordkeeping requirement. If so, it seems the amendment should include a description of the new requirement and an estimate of the burden for the newly proposed recordkeeping requirement. You could check with Philip in OECA and/or we can check with Grant tomorrow.

Susan Stahle Air and Radiation Law Office (Rm 7502B) Office of General Counsel U.S. Environmental Protection Agency 1200 Pennsylvania Avenue, NW (ARN: MC 2344A) Washington, D.C. 20460

ph: (202) 564-1272 fax: (202) 564-5603 stahle.susan@epa.gov

> Tom Peake Sue and Reid, I appreciate your input on this effort. 03/05/2012 12:33:23 PM

From: Tom Peake/DC/USEPA/US

Susan Stahle/DC/USEPA/US@EPA To:

Cc: Reid Rosnick/DC/USEPA/US@EPA, Alan Perrin/DC/USEPA/US@EPA, Daniel

Schultheisz/DC/USEPA/US@EPA, Wendy Blake/DC/USEPA/US@EPA, Philip

Egidi/DC/USEPA/US@EPA

03/05/2012 12:33 PM Date:

Re: Revisions to Subpart W Preamble and Rule - PRA/ICR and cost impacts discussion issues Subject:

Sue and Reid,

I appreciate your input on this effort.

We have an ICR for rad NESHAPs that is currently in the renewal phase. Wouldn't it apply? Could we make changes at this stage if need be?

This was in the FR on January 24.

http://www.gpo.gov/fdsys/pkg/FR-2012-01-24/pdf/2012-1364.pdf

60-day comment period now underway.

Tom Peake Director Center for Waste Management and Regulations US EPA (6608J) 1200 Pennsylvania Ave, NW Washington, DC 20460 phone: 202-343-9765

Physical Location and for deliveries: Room 529 1310 L St, NW Washington, DC 20005

From: Susan Stahle/DC/USEPA/US
To: Reid Rosnick/DC/USEPA/US@EPA

Cc: Alan Perrin/DC/USEPA/US@EPA, Daniel Schultheisz/DC/USEPA/US@EPA, Tom

Peake/DC/USEPA/US@EPA, Wendy Blake/DC/USEPA/US@EPA

Date: 03/05/2012 11:52 AM

Subject: Re: Revisions to Subpart W Preamble and Rule - PRA/ICR and cost impacts discussion issues

Hi Reid -

I've reviewed the changes you described below.

I've made edits in those sections that I hope you can see since it appears they show up in red. I highlighted in yellow some of my edits so you can see them but did not do that throughout the package.

It appears that the remaining issues with the package are as follows:





Please let me know if you have any questions.

[attachment "Draft Outline FR Proposal for Revision of Subpart W Rev10 (ss 030512).docx" deleted by Tom Peake/DC/USEPA/US]

Susan Stahle
Air and Radiation Law Office (Rm 7502B)
Office of General Counsel
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW (ARN: MC 2344A)

Washington, D.C. 20460 ph: (202) 564-1272 fax: (202) 564-5603 stahle.susan@epa.gov

Reid Rosnick From: Reid Rosnick/DC/USEPA/US To: Susan S... 03/01/2012 04:59:57 PM

From: Reid Rosnick/DC/USEPA/US
To: Susan Stahle/DC/USEPA/US@EPA

Cc: Alan Perrin/DC/USEPA/US@EPA, Tom Peake/DC/USEPA/US@EPA, Daniel

Schultheisz/DC/USEPA/US@EPA

Date: 03/01/2012 04:59 PM

Subject: Revisions to Subpart W Preamble and Rule

Hi Sue,

Attached for your review are the revisions I made based on your comments from Monday. Any area where you made changes I accepted, so you won't see those passages in red. Where you made comments I have changed or added text. I left your comments on the side so you could see where the change are. For your convenience, the pages with changes are located at:

(b)(5) - Deliberative Process Privilege

(b)(5) - Deliberative Process Privilege

Please let me know if you have any question. Thanks

Reid

Reid J. Rosnick Radiation Protection Division (6608J) U.S. Environmental Protection Agency 1200 Pennsylvania Ave., NW Washington, DC 20460 202.343.9563

rosnick.reid@epa.gov[attachment "Draft Outline FR Proposal for Revision of Subpart W Rev10.docx" deleted by Tom Peake/DC/USEPA/US]